

Grand County Internet Services

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Date 12/28/2017

Comments Regarding Notice of Proposed Rulemaking, GN Docket No. 17-258

Grand County Internet Services Inc. is a small WISP in Grand County Colorado. Grand County consists of 3 census blocks. I serve all of these. The PEA containing our county encloses all of northwest Colorado. As a small business, serving only our county, it would be impossible to bid in auction for the PEA area.

We use the 3.65-3.7 Ghz for some of our backbones currently. Primarily we use 5Ghz spectrum to directly server our 1100 customers. That spectrum is very crowded. Almost all of our customers are outside towns served by Century Link DSL and Comcast Cable. Verizon is the largest Mobile Wireless in the county, with some AT&T, Sprint and others.

Our towers are such that we could take advantage of the CBRS mid-band spectrum immediately. There are no special buildout that we must do.

I am surprised that the FCC would even consider the changes in the rules offered by the mobile wireless industry after some many years of work developing equipment, standards and software by the rest of the industry that have been working on this.

To be clear we oppose the proposals to increase the size of PALs to the size of a PEA or even a county. The three-tier model is innovative and allows networks of all types and use cases to develop. GAA spectrum is fundamentally important to service providers as well as other independent networks. We support the WISPA proposals including the licensing terms.

Thank you for your consideration,

Name Eden Recor

Title Owner/CEO

Grand County Internet Services Inc.